

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:

LISA MARIE NOVOSAT

Debtor.

:CHAPTER 13  
:CASE NO. 22-22250-CMB  
:Document Number: 55  
:Hearing Date: May 21, 2024 @ 2:30 p.m.

Truman 2021 SC9 Title Trust, Movant/Secured Creditor:

v.

LISA MARIE NOVOSAT and  
Ronda J. Winneccour

Respondents.

**STIPULATION RESOLVING RELIEF MOTION**

THIS matter being opened to the Court by secured creditor, Truman 2021 SC9 Title Trust, (hereinafter "Truman"), upon the filing of a motion for relief from stay with regard to real property commonly known as 48 Marion Drive, Zelienople, Pennsylvania 16063; and thereafter the Chapter 13 Trustee having filed a reply to Truman's motion; and it appearing that the parties have amicably resolved their differences which was reflected on the record at the May 21<sup>st</sup> hearing, and for good cause shown;

1. Debtor shall file an amended chapter 13 plan bringing her plan payments current within two weeks from the entry of this Order.
2. An attorney fee reimbursement of \$500.00 to Truman shall be included in the amended plan.
3. Truman's full pre-petition claim as filed in Proof of Claim Number 4 shall be honored and paid by the Trustee.
4. The Trustee shall continue to pay post-petition mortgage payments to Truman and the past due post-petition mortgage arrearages due to it stated in the motion shall be cured in normal course through Debtor's amended plan.

5. Truman may file a certification of default with this Court if Debtor defaults on future Chapter 13 Trustee payments under the amended plan.

*The undersigned hereby consent to the form and entry of the within order.*

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri, Esquire  
Attorney for Secured Creditor, Truman

Date: 5/24/2024

/S/DANIEL P. FOSTER

Daniel P. Foster, Esquire  
Attorney for Debtor, Lisa Maria Novosat

Date: 5/28/2024

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**Honorable Carlota M. Bohm  
U.S. Bankruptcy Court  
Western District of  
Pennsylvania**